

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

RURAL COMMUNITY WORKERS ALLIANCE
and JANE DOE,

Plaintiffs,

vs.

SMITHFIELD FOODS, INC. and SMITHFIELD
FRESH MEATS CORP.,

Defendants.

Case No. 5:20-cv-06063-DGK

**DEFENDANTS' MOTION TO DISMISS, OR IN THE ALTERNATIVE TO STAY,
BASED ON PRIMARY JURISDICTION AND/OR BURFORD ABSTENTION**

Come now Defendants, Smithfield Foods, Inc. and Smithfield Fresh Meats Corp., by and through counsel, and move this Court to dismiss Plaintiffs' Complaint, or in the alternative stay this proceeding, for the reasons set forth in Defendants' Suggestions in Support.

**SMITHFIELD FOODS, INC. and
SMITHFIELD FRESH MEATS CORP.**

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of the same to the following counsel of record:

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I hereby certify that I will send copies of the foregoing via electronic mail to Plaintiffs' counsel who have pending motions to appear *pro hac vice*:

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